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14 *Attorneys for Dignity Health and Its Affiliates*

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

PG&E CORPORATION

and

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects **both Debtors**

*All papers shall be filed in the Lead Case
No. 19-30088 (DM)

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

1 **PLEASE TAKE NOTICE** that the undersigned, hereby files their appearances as attorneys
2 for Bakersfield Memorial Hospital, Dignity Community Care, Dignity Community Care dba
3 French Hospital Medical Center, Dignity Community Care dba Methodist Hospital, Dignity
4 Community Care dba Sequoia Hospital, Dignity Community Care dba Woodland Memorial
5 Hospital, Dignity Health, Dignity Health Connected Living, Dignity Health dba Dominican
6 Hospital, Dignity Health dba French Hospital Medical Center, Dignity Health dba Marian Regional
7 Medical Center, Dignity Health dba Marian Regional Medical Center - Arroyo Grande, Dignity
8 Health dba Mercy General Hospital, Dignity Health dba Mercy Hospital (Bakersfield), Dignity
9 Health dba Mercy Hospital and Mercy Southwest Hospital, Dignity Health dba Mercy Hospital of
10 Folsom, Dignity Health dba Mercy Medical Center (Merced), Dignity Health dba Mercy Medical
11 Center Redding, Dignity Health dba Mercy San Juan Medical Center, Dignity Health dba Mercy
12 Southwest Hospital, Dignity Health dba Sequoia Hospital, Dignity Health dba St. Elizabeth
13 Community Hospital, Dignity Health dba St. Mary's Medical Center, Dignity Health Medical
14 Foundation, Dignity Health Medical Foundation dba Dignity Health Medical Group – Dominican,
15 Dignity Health Medical Foundation dba Dignity Health Medical Group – Merced, Dignity Health
16 Medical Foundation dba Dignity Health Medical Group - North State, Dominican Oaks
17 Corporation, Pacific Central Coast Health Centers, Port City Operating Company, LLC, Port City
18 Operating Company, LLC dba St. Joseph's Behavioral Health Center, Port City Operating
19 Company, LLC dba St. Joseph's Medical Center of Stockton, Saint Francis Memorial Hospital,
20 Sierra Nevada Memorial - Miners Hospital (“DIGNITY”) in the above-referenced chapter 11 cases,
21 hereby requests that all notices given or required to be given in this case to creditors, any creditors'
22 committee, or any other party in interest (including all matters described pursuant to Bankruptcy
23 Code Section 102(1) and Bankruptcy Rules 2002(a), (b), (c), (f) and (i), 3017(a), 9007 and 9010)
24 and all papers or other documents filed, served or required to be served in the above-captioned
25 cases, be served on the addressees listed below and that, pursuant to Bankruptcy Rules 2002 (g) and
26 9007, the following be added to the Court’s master mailing list:

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1 Randy B. Soref
2 Polsinelli LLP
3 2049 Century Park East, Suite 2900
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8 - and -

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15 **PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the
16 notices and papers referred to in the rules specified above but also includes, without limitation,
17 orders and notices of any plans, disclosure statements, applications, motions, petitions,
18 pleadings, requests, complaints, demands, whether formal or informal, whether written or oral
19 and whether transmitted or conveyed by mail delivery, telephone, telegraph, facsimile
20 transmission, telex, or otherwise.

21 **PLEASE TAKE FURTHER NOTICE** that neither this request for notice nor any
22 subsequent appearance, pleading, proof of claim, claim or suit is intended or shall be deemed or
23 construed as:

24 (a) a consent by DIGNITY to the jurisdiction of this Court or any other court with
25 respect to proceedings, if any, commenced in any case against or otherwise involving
26 DIGNITY;

27 (b) a waiver of any right of DIGNITY to (i) have an Article III judge adjudicate in the
28 first instance any case, proceeding, matter or controversy as to which a Bankruptcy Judge may
not enter a final order or judgment consistent with Article III of the United States Constitution,
(ii) have final orders in non-core matters entered only after de novo review by a District Court
Judge, (iii) trial by jury in any proceeding so triable in the Case or in any case, controversy, or
proceeding related to the Case, (iv) have the United States District Court withdraw the
reference in any matter subject to mandatory or discretionary withdrawal, (v) any and all rights,

1 claims, actions, defenses, setoffs, recoupments or remedies to which DIGNITY is or may be
2 entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses,
3 setoffs and recoupments are expressly reserved hereby, or (vi) the requirements for service of
4 process under Federal Rule of Bankruptcy Procedure 7004; or

5 This request for notice is based upon the Bankruptcy Code and the Federal Rules of
6 Bankruptcy Procedure, including Rules 2002, 3017, 9007, and 9010, but is not a consent to
7 jurisdiction of the Bankruptcy Court over DIGNITY, and is not a waiver of DIGNITY's rights,
8 specifically, but not limited to: (i) DIGNITY's rights to have final orders in certain matters
9 entered only after de novo review by a district judge; (ii) DIGNITY's rights to trial by jury in any
10 proceeding so triable herein, or in any case, controversy, or proceeding related hereto; (iii)
11 DIGNITY's rights to have the reference withdrawn by the District Court in any matter subject to
12 mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs,
13 or recoupments to which DIGNITY is or may be entitled under any agreement, in law, or in
14 equity — all of which rights, claims, actions, defenses, setoffs, and recoupments DIGNITY
15 expressly reserves.

16 Dated: March 26, 2019

Respectfully submitted,
POLSINELLI PC

18 By: /s/ Randye B. Soref
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**ATTORNEYS FOR DIGNITY HEALTH and
ITS AFFILIATES**